



## CLIFFORD LAW OFFICES®

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June 3, 2024

Honorable Rukhsanah L. Singh, U.S. Magistrate Judge  
United States District Court- District of NJ  
Clarkson S. Fisher Building & U.S. Courthouse  
402 East State Street, Court Room 7W  
Trenton, NJ 08608

**Re: *In re: Johnson & Johnson Talcum Powder Products Marketing, Sales Practices and Products Liability Litigation - MDL 2738***

**This correspondence relates to *King v. J&J, et al.*, Case No. 2018 -CV- 03342**

Your Honor:

This afternoon, the Johnson & Johnson Defendants submitted a letter [Dkt. No. 32601] asking why cases on their attached Exhibit A [Dkt. No. 32601-02] should not be dismissed with prejudice for an alleged failure to serve a Plaintiff Profile Form (“PPF”) pursuant to the process set up in the Case Management Order dated February 13, 2024 [Dkt. No. 29032]. The letter does not reflect accurate information.

Counsel for the Johnson & Johnson Defendants identified a case filed by the undersigned counsel, *King v. J&J, et al.*, case No. 2018 -CV- 03342, as not having complied with the Court’s order [See Dkt. No. 185004, page 11 of 41, row 429]. Contrary to Defendants’ assertion, the *King* matter (2018-CV-03342) is in compliance. A copy of the Registry as it exists today, June 3, 2024 as of 2:39 p.m. CST is attached, hereto, as Exhibit 1<sup>1</sup>. The printed display of the MDL Centrality portal very plainly demonstrates that the Plaintiff, Roger King (on behalf of Shelly King, deceased) is in full compliance as of February 9, 2024. Plaintiff’s case should not be dismissed, because Plaintiff has been, and remains, in compliance with the Order. Plaintiff is prejudiced by Defendant J&J’s inaccurate reports to the contrary.

Accordingly, Plaintiff, Roger King, Independent Administrator of the Estate of Nicole King, deceased (Case No. 2018-CV-03342), seeks entry of an Order that (1) directs Johnson & Johnson to correct the Record

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<sup>1</sup> Ms. King’s birth date is redacted, but fully accessible in the MDL Centrality portal.



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in the docket, at least concerning the *King* case, so as to avoid further prejudice to the King family; (2) instructs Johnson & Johnson to directly coordinate with Brown Greer for the purpose of updating and/or verifying J&J's own access to the MDL Centrality records including the portal's full and complete content; (3) instructs J&J to meet and confer with the undersigned if its counsel contend that the King submission is not contained within the portal (it was there as of the time of this filing, see Exhibit 1); and, (4) whatever further relief this Court deems just and appropriate.

Thank you for your consideration of these matters.

Respectfully submitted,

/s/ Shannon M. McNulty

Shannon M. McNulty

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cc:

Leigh O'Dell, Esq. (via e-mail)

Michelle Parfitt, Esq., (via e-mail)

All counsel of record (via ECF)

# EXHIBIT 1



Talcum Powder Litigation

My Account ▾

◀ Return to Search Results

Plaintiff Information



Plaintiff Profiles

Plaintiff ID: 58551

Date of Birth: 1 [REDACTED]

Name: SHELLY KING

Email:

Case Number: 2018 CV 03342

Name of first  
named Plaintiff on  
Complaint: KING ROGER

Jurisdiction: MDL

Firm Internal Case  
ID: 160079B4

Request Deactivation

Plaintiff Forms

Click Start/Edit next to the form that you want to complete and start providing information.

You may send the plaintiff forms to the plaintiff by clicking Send to Plaintiff to generate an email with a link to access MDL Centrality. The access link is active for 14 days. You may use this function to send a Form to your client as often as necessary.

Send to Plaintiff

I. Plaintiff Profile Form **Submitted**

Amend Profile From

[Paying Filing Fee](#) | [Registering Plaintiffs](#)

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## Documents

Upload 

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Show 10  entries

Document ID 	Document Type 	Upload Date 	Produced By 	Produced Date 	Action
170018	Plaintiff Profile Form	02/09/2024	McNulty, Shannon	02/09/2024	
169979	Medical Records OSF 7.27.07	02/09/2024	McNulty, Shannon	02/09/2024	<a href="#">Request</a> <a href="#">Removal</a> <a href="#">Approval</a>
169967	Medical Records - OSF 3.3.08	02/09/2024	McNulty, Shannon	02/09/2024	<a href="#">Request</a> <a href="#">Removal</a> <a href="#">Approval</a>
169962	Medical Records - OSF_11.21.08	02/09/2024	McNulty, Shannon	02/09/2024	<a href="#">Request</a> <a href="#">Removal</a> <a href="#">Approval</a>
169960	Medical Records - OSF_6.27.05	02/09/2024	McNulty, Shannon	02/09/2024	<a href="#">Request</a> <a href="#">Removal</a> <a href="#">Approval</a>
169959	Medical Records OSF 4.12.07	02/09/2024	McNulty, Shannon	02/09/2024	<a href="#">Request</a> <a href="#">Removal</a> <a href="#">Approval</a>
169957	Medical Records OSF 5.8.07	02/09/2024	McNulty, Shannon	02/09/2024	<a href="#">Request</a> <a href="#">Removal</a> <a href="#">Approval</a>
169956	Medical Records - OSF_6.10.07	02/09/2024	McNulty, Shannon	02/09/2024	<a href="#">Request</a> <a href="#">Removal</a> <a href="#">Approval</a>
169953	Medical Records - OSF Medical Center	02/09/2024	McNulty, Shannon	02/09/2024	<a href="#">Request</a> <a href="#">Removal</a> <a href="#">Approval</a>
169943	Hospital Bill or Invoice OSF_Bills	02/09/2024	McNulty, Shannon	02/09/2024	<a href="#">Request</a> <a href="#">Removal</a> <a href="#">Approval</a>

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